REMARKS

Claims 1, 4 and 6 through 9 are pending in the case.

Claims 2, 3, 5 and 10 through 20 have been canceled.

Claims 6 and 7 have been withdrawn from consideration.

Claim 1 has been amended

Rejection of claims under 35 U.S.C. § 102 and 103

Examiner has rejected claims 1, 4 and 9 under 35 U.S.C. § 102(b) as being anticipated by USPN 6,422,688 B2 (Giere). Examiner has rejected claim 8 under 35 U.S.C. § 103 (a) as being unpatentable over Giere in view of USPN 5,699,462 (Fouquet). Applicant has amended claim 1. Applicant respectfully traverses the rejection of the claims. Below, Applicant discusses limitations within independent claim 1 not disclosed or suggested by the cited art. On the basis of this, Applicant believes all the claims dependent on claim 1 are patentable over the cited art.

Discussion of Independent Claim 1.

Claim 1 sets out a heating device within an integrated circuit. The heating device includes a first conductive lead, a second conductive lead, a third conductive lead, a first resistive region connected between the first conductive lead and the third conductive lead, and a second resistive region connected between the second conductive lead and the third conductive lead. A side formed by the first conductive lead and the first resistive region is parallel to a

side formed by the second conductive lead and the second resistive region. An insulator is placed between the side formed by the first conductive lead and the first resistive region and the side formed by the second conductive lead and the second resistive region, except for at least one area directly between the first resistive region and the second resistive region, the at least one area including a third resistive region immediately adjacent to the third conductive lead. An entire first side of the third resistive region is in physical and electrical contact with the first resistive region and an entire second side of the third resistive region is in physical and electrical contact with the second resistive region. This is not disclosed or suggested by the cited art.

Particularly, Examiner has argued that portion 901 shown in Figure 9 of Giere is equivalent to the third resistive region set out in claim 1. This is incorrect.

In order for portion 901 to qualify as the third resistive segment set out in claim 1, it would be necessary for portion 901 to be located directly between resistor segments 501 and 502. Further, it would be necessary for an entire first side of portion 901 to be in physical and electrical contact with resistor segment 501 and an entire second side of portion 901 to be in physical and electrical contact with resistor segment 502. As can be seen by Figure 9 of Giere, this is not the case.

Figure 9 of Giere shows that portion 901 is not located directly between resistor segments 501 and 502. Further, there is no entire side of portion 901 that is in physical and electrical contact with resistor segment 501 and there is no

entire side of portion 901 that is in physical and electrical contact with resistor segment 502.

Further, it would not be obvious to a person of ordinary skill in the art to move portion 901 to satisfy the requirements of claim 1. Portion 901 is located in the midst of conductor 515 to avoid current crowding. See Giere at column 10, lines 4 through 11. Locating portion 901 outside of the midst of conductor 515 to a location between resistor segments 501 and 502 would destroy the very purpose for including portion 901 in the segmented heater resistor shown in Figure 9 of Giere. Such a change would be counter to the specific teaching of Giere.

Discussion of Claims 6 and 7

Based at least on the allowability of independent claim 1, Applicant believes that claims 6 and 7, dependent on claim 1, are allowable.

Conclusion

Applicant believes this Amendment has placed the present application in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,

TYLER SIMS

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